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Mary L. Cottrell, Secretary
Department of Telecommunications and Energy
One South Station, 2nd Floor
Boston, MA 02110

Re: D.T.E. 01-20 -- Verizon MA Response to AT&T and Conversent Comments

Dear Ms. Cottrell:

Verizon Massachusetts (“Verizon MA”) hereby responds to AT&T’s and Conversent’s letters of July 2, which accuse Verizon MA of seeking untimely and unfounded reconsideration of the Department’s prior orders with respect to Verizon MA’s proposed alternative hot cut process and suggest that Verizon MA’s proposal is designed to shield its alternative hot cut process from Department review. Neither allegation is correct. In its January 14, 2003 Order on Motions for Partial Reconsideration, at 146, the Department made clear that its overarching concern was that “Verizon’s new hot cut rates . . . not go into effect until the alternative hot cut process, based on the SBC frame due time process, is operational to [its] satisfaction.” As Verizon MA has shown, its alternative hot cut process *is* now operational, and, in fact, is being used by several CLECs, including AT&T and Conversent. Since the Department’s primary concern was protecting the interests of the CLECs by ensuring that an alternative process was in place before implementing new rates, that concern should now lead the Department to *permit* Verizon MA to offer its alternative hot cut process pending the outcome of the Department’s more comprehensive review of the rates for the alternative process. And, contrary to Conversent’s suggestion, permitting Verizon MA to make this offering now would in no way preclude the Department from full review of the alternative hot cut offering and requiring any necessary modifications in the future.

Notably, neither AT&T nor Conversent suggests that Verizon MA should be prohibited from offering the WPTS option, or suggest that that option is in any way not

Letter to Secretary Cottrell
D.T.E. 01-20
July 9, 2003
Page 2

operational or contrary to the CLECs' interests. They argue only that the Department should prohibit Verizon MA from assessing the appropriate cost-based rates for that option that are included in Verizon MA's compliance filing, until such time as the Department completes its review. This is because the CLECs, as Convesent expressly admits, would much prefer to obtain the benefits of WPTS at the existing non-recurring rates, which clearly do not account for the relevant costs. But again, since CLECs may select the existing standard hot cut option instead of the WPTS option, there can be no argument that CLECs would be harmed if Verizon MA were permitted to offer WPTS at Verizon MA's proposed rates as an additional option, until such time as the Department may order a different rate.

Finally, to alleviate any possible concerns that the Department -- or the CLECs -- might have, Verizon MA would be prepared to offer CLECs that order the WPTS option at Verizon MA's WPTS tariff rate a true up to whatever rates the Department may finally approve at the conclusion of its alternative hot cut inquiry.

Respectfully submitted,

Bruce P. Beausejour

cc: Marcella Hickey, Esquire, Hearing Officer
Tina Chin, Esquire, Hearing Officer
Michael Isenberg, Esquire, Telecommunications Director
Attached Service List